# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

WATERKEEPER ALLIANCE, INC.,

Plaintiff,

Civil Action No. 10-CV-1136 (NSR)

v.

DECLARATION OF DANIEL E. ESTRIN

SPIRIT OF UTAH WILDERNESS, INC., d/b/a GREAT SALT LAKEKEEPER, or GREAT SALT LAKE WATER KEEPERS.

Defendant.

Daniel E. Estrin declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

- 1. I am the General Counsel of plaintiff Waterkeeper Alliance, Inc. ("Waterkeeper") and submit this declaration in support of Waterkeeper's motion for the imprisonment of Jeffrey Salt ("Salt") for his continuous contempt of three prior Orders of this Court.
- 2. Salt has kept current the State of Utah registration for defendant Spirit of Utah Wilderness, Inc. ("SUW"), which was last renewed on July 1, 2019. Salt lists himself as the registered agent for SUW and his address as 723 E. Lisonbee Avenue, Salt Lake City, UT 084106. SUW's corporation registration states that SUW is doing business as "Great Salt Lakekeeper" and "Great Salt Lake Water Keepers." A copy of the SUW's registration is annexed hereto as **Exhibit A**.

- 3. Salt still maintains the website <a href="http://greatsaltlakekeeper.org">http://greatsaltlakekeeper.org</a>, where he refers to himself as the "Great Salt Lakekeeper" and "Lakekeeper." A copy of a screenshot from that site is annexed hereto as **Exhibit B**.
- 4. Salt continues to refer to himself as the Great Salt Lakekeeper on his LinkedIn website page. A screenshot of Salt's LinkedIn page is annexed hereto as **Exhibit C**.

DATED: New York, New York December 5, 2019

Daniel E. Estrin

# **EXHIBIT A**



## SPIRIT OF UTAH WILDERNESS, INC., THE

Update this Business

Entity Number: 1130209-0140

Company Type: Corporation - Domestic - Non-Profit Address: 723 E LISONBEE AVE Salt Lake City, UT 84106

State of Origin: UT

Registered Agent: JEFF SALT Registered Agent Address: 723 E LISONBEE AVE

Salt Lake City, UT 84106

View Management Team

Status: Active

Purchase Certificate of Existence

Status: Active as of 09/07/2001

Renew By: 06/30/2020 Status Description: Current

The "Current" status represents that a renewal has been filed, within the most recent

renewal period, with the Division of Corporations and Commercial Code.

Employment Verification: Not Registered with Verify Utah

History View Filed Documents

Registration Date: 06/14/1993 Last Renewed: 07/01/2019

Additional Information

NAICS Code: 9241 NAICS Title: 9241-Administration of Environmental Qua

Doing Business As

FRIENDS OF UTAH LAKE, THE
LAKE RESTORATION SOLUTIONS, INC.
GREAT SALT LAKE WATERSHED COUNCIL
FRIENDS OF THE BEAR RIVER, THE
CITIZENS ORGANIZED TO PROTECT PARLEY'S HISTORIC NATURE PARK
GREAT SALT LAKEKEEPER
FRIENDS OF PARLEY'S HISTORIC NATURE PARK, THE
GREAT SALT LAKE WATER KEEPERS
JORDAN RIVER RESTORATION NETWORK
FRIENDS OF THE JORDAN RIVER, THE
FRIENDS OF RED BUTTE CREEK, THE

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Search by: Business Name Number Executive Name Search Hints

**Business Name:** 

# **EXHIBIT B**

Great Salt Lakekeeper



"Clean water is a community solution"

Great Salt Lakekeeper's Mission is to protect, preserve and defend the watershed resources of the Great Salt Lake drainage basin.

WWW.GREATSALTLAKEKEEPER.ORG

Lakekeeper Jeff Salt

Contact Info

P.O. Box 522220 S.L.C., UT 84142

(801) 485-2550

**Email Us** 



# **River Cleanups**

Every year, Great Salt Lakekeeper plans community based river cleanup projects throughout the watershed. With the help of volunteer groups we remove tons of garbage from the waterways.

Organizations can utilize Great Salt Lakekeeper's services to plan river cleanup projects in their cities and neighborhood communities.

In 2007, Great Salt Lakekeeper received an award from the Utah Pollution Prevention Association for our 2006 Jordan River Cleanup Campaign.





### **Watershed Tours**

Great Salt Lakekeeper provides a unique opportunity to experience the wonderful waterways of the Great Salt Lake watershed region that combines environmental education and recreation.



We operate a fleet of 10 canoes and provide group tours for up to 30 people to some of the following watershed locations:

- · Jordan River
- Utah Lake
- Bear River
- · Jordanelle Reservoir
- · Little Dell Reservoir
- · Smith and Morehouse Reservoir
- · And many more locations ...



# Great Salt Lake Mercury Reduction Program

Mercury concentrations in Great Salt Lake are the highest levels ever tested by federal scientists, and may pose significant health risks to humans and wildlife living in the drainage basin region.

Great Salt Lakekeeper is working to help evaluate the extent of mercury in our watershed, identify probable sources, assess human health risks, determine economic impacts, and to provide public education.

The extent of mercury compounds in our watershed may be the result of toxic emissions from coal-fired power plants or gold mines operating nearby in Nevada.





# EXHIBIT C

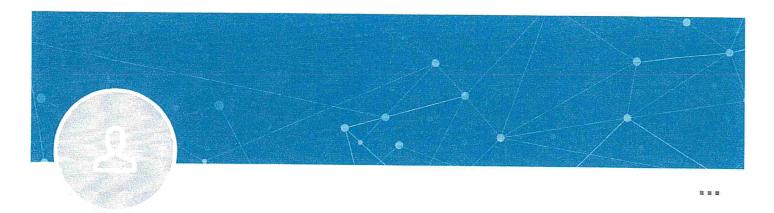
Linked in

Join now

Sign in



Q Jeff Salt



# Jeff Salt

Owner, Cosmic Aeroplane, Great Salt Lakekeeper Salt Lake City, Utah · 21 connections

Cosmic Aeroplane, Great Salt Lakekeeper

Sign in to Connect

# Experience



#### Owner

Cosmic Aeroplane, Great Salt Lakekeeper

Apr 2001 - Present · 18 years 9 months

# View Jeff Salt's full profile to

- See who you know in common
- ✓ Get introduced
- ✓ Contact Jeff Salt directly

Sign in to view full profile

Jeff Salt - Owner - Cosmic Aeroplane, Great Salt Lakekeeper | LinkedIn



Join now

Sign in



Q Jeff Salt



## Matthew Salt

Senior Financial & Business Development Analyst at Dean Health Plan, Inc.



## **David Driggs**

President at Mighty Penguin Inc., helping visionaries change the world



## John Bennett

Contract Analyst, Utah Department of Workforce Services



# Cheryl McEnaney

Artist Development & Strategic Marketing Consultant



### Anthony Baron Kirk

Professional Coaching | Nutrition, Lifestyle, and Movement | Founder and President of ASEDA, LLC



# Clint Hoaldridge

IT Wizard Extraordinaire



#### Wally Schwab

Project Manager at Moreno Brothers Construction & Waterproofing



## **Brigette Nunley**

QA Technician at LifeVantage Corporation



#### Denise Gronke

Modern MLM - Learn new ways to build your Network Marketing Company! at Modern MLM Insiders Course

# Others named Jeff Salt



### Jeff Salt

Sommelier/Collins Square Hospitalty Group/Jeff Salt Consulting Melbourne, Australia



#### Jeff Salt

Jeff Salt - Owner - Cosmic Aeroplane, Great Salt Lakekeeper | LinkedIn



Join now

Sign in



Q Jeff Salt

lampa/St. Petersburg, Florida Area

#### Jeff Salt

Paramedic at Rockland Paramedic Services

Greater New York City Area

#### Jeff Salt

Operations Manager at Leslie Emergency Vehicles

Toronto, Canada Area

20 others named Jeff Salt are on LinkedIn

See others named Jeff Salt

# Jeff's public profile badge

Include this LinkedIn profile on other websites

#### Jeff Salt

Owner, Cosmic Aeroplane, Great Salt Lakekeeper

Owner at Cosmic Aeroplane, Great Salt Lakekeeper



# View profile badges

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Jeff Salt - Owner - Cosmic Aeroplane, Great Salt Lakekeeper | LinkedIn